

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

Northern Division

CATO INSTITUTE

and

MACKINAC CENTER FOR PUBLIC
POLICY,

Plaintiffs,

v.

MIGUEL CARDONA, Secretary, U.S.
Department of Education, in his official capacity;

RICHARD CORDRAY, Chief Operating Officer
of Federal Student Aid, U.S. Department of
Education, in his official capacity;

U.S. DEPARTMENT OF EDUCATION;

Defendants.

CIVIL CASE NO. _____

**DECLARATION OF JOSEPH G.
LEHMAN**

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1. I, Joseph G. Lehman, President of the Plaintiff Mackinac Center for Public Policy Institute ("Mackinac Center") am over the age of 18 years old.

2. I graduated from the University of Illinois College of Engineering and hold a BS degree in Engineering.

3. I have been the President of the Mackinac Center for 15 years and make this declaration on my own knowledge and the records of the organization.

4. The Mackinac Center is organized as a § 501(c)(3) organization under the Internal Revenue Service Code and is incorporated in the State of Michigan.

5. The Mackinac Center's mission is to enhance quality of life in Michigan by developing free-market policies, challenging government overreach, and fostering a climate of public opinion that encourages policymakers to act in the public interest.

6. The Mackinac Center currently has approximately 45 employees working to fulfill its mission.

7. At the time of this declaration, the Mackinac Center has 1 employment opportunities open and available for which it seeks new employees to help fulfill its mission.

8. The Mackinac Center employs, has employed, and seeks to recruit for employment individuals who have federal student loans.

9. Current and previous Mackinac Center employees have participated in the Public Service Loan Forgiveness (PSLF) program.

10. As a matter of basic economics, the Department of Education's One-Time Account Adjustment reduces the incentives of affected student-loan borrowers to seek debt forgiveness through PSLF and thus will disadvantage the Mackinac Center in the market to recruit and retain these borrowers as employees.

11. The One-Time Account Adjustment will reportedly cancel \$39 billion in student-loan debt on August 13, 2023. This cancellation will also reportedly extinguish the incentive for nearly a million student-loan borrowers to seek debt forgiveness through PSLF and thus will disadvantage the Mackinac Center in the market to recruit and retain these borrowers as employees.

I declare under penalty of perjury that the foregoing is true and correct.

Executed On: _____

8/4/23

Joseph G. Lehman, President, Mackinac Center